

REMARKS

Applicants appreciate the thoroughness with which the Examiner has examined the above-identified application. Reconsideration is requested in view of the amendments above and the remarks below.

Rejection under 35 USC § 112, second paragraph

Claims 10 and 20 stand rejected under 35 USC § 112, second paragraph as being indefinite for use of the terms "intuitive" and "natural." Applicants have amended these claims to remove these terms.

Rejection under 35 USC § 102

Claims 1-20 stand rejected under 35 USC § 102(e) as being anticipated by Shetty U.S. Patent Publication No. US 2003/0084011 A1. Applicants respectfully traverse this rejection.

Applicants' invention is directed to a method for designing a knowledge portal for retrieving, organizing and delivering knowledge to a user belonging to an organization. The method identifies a community of users belonging to the organization characterized by a common interest with respect to the knowledge, and identifies business processes executed by the users in the community in accordance with strategies of the organization. The method then includes analyzing the business processes to identify specific activities performed in executing said processes and patterns for performing the respective activities; and constructing the knowledge portal in accordance with the patterns.

Applicants have added new claims 21-24, which recite that the constructed knowledge portal provides information search and retrieval by indexing content from multiple knowledge sources and delivering the content to users in the community. Support for this subject matter is found in the specification at page 5, lines 14-20.

Applicants have also added new claims 25 and 26, dependent on claims 9 and 19, respectively, which recite that the hierarchy of categories and subcategories is determined from recurring knowledge retrieval patterns in usage scenarios of the community of users. Support for this subject matter is found in the specification at page 10, lines 19 through page 11, line 24 and in original claims 2 and 3.

The Shetty publication cited by the Examiner is directed to a method of solving the "traveling salesman" problem, and finds application in other areas such as finding a route in a supply chain (Figs. 6A-14 and paragraphs 0040-0061) and finding distribution chains to satisfy customer demand for and Internet enterprise (Figs. 15-16 and paragraphs 0062-0063). However, designing knowledge portals is not an application disclosed or suggested by Shetty, and applicants' claimed invention is not disclosed or suggested therein.

The Examiner cites Fig. 6A and item 604 as disclosing all of the steps of claim 1. However, notwithstanding the Examiner's noted ability to construe the claims broadly, this portion of Shetty cannot reasonably be so broadly construed. For example, Fig. 6A identifies customers placing online orders from an Internet company 602, and the use of processing modules 608 to access a database 610 of customers and suppliers to create a pickup route 612 from suppliers and a delivery route 614 to the customers.

Applicants' invention delivers "knowledge" to the users of an organization by constructing a knowledge portal in accordance with the steps prescribed in claims 1 and 11. The Examiner identifies customers 604 which he deems to be comparable to applicants' claimed users belonging to an organization. However, the method described by Shetty does not deliver "knowledge" to those users, i.e., customers, but instead deliver tangible products by conventional shipping methods. Shetty is therefore non-analogous art since it is not directed to retrieving, organizing and delivering knowledge to a user. Moreover, applicants' invention is particularly directed to the method of organizing or categorizing business knowledge, data and tools prior to delivery of the knowledge to the user.

In particular, Shetty's method does not "identify a community of users belonging to the organization characterized by a common interest with respect to the knowledge" since the customers are ordering products, and have no common interest with respect to knowledge. Further Shetty does not identify business processes executed by the customers in accordance with strategies of the organization, or analyze the business processes to identify specific activities performed in executing such processes, as required by claims 1 and 11. Also, Shetty does not identify patterns for performing the specific activities performed in executing such processes, as required by claim 1, or develop scenarios for using the portal in performing the respective activities and examine the scenarios to identify patterns therein, as required by claim 11. Finally, Shetty does not construct the knowledge portal in accordance with such patterns. Accordingly, Shetty cannot be said to

anticipate the specific steps and limitations of claims 1 and 11 with respect to constructing applicants' knowledge portal.

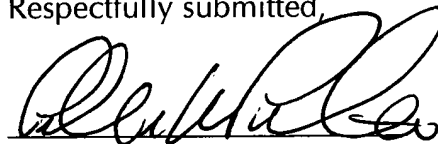
Likewise, the specific steps and limitations of claims dependent on independent claims 1 and 11 are not disclosed or suggested in the Shetty publication, and Shetty cannot be said to anticipate those claims as well.

Declaration under Rule 131

Applicants are also enclosing herewith a declaration under 37 CFR § 1.131 to swear behind the Shetty reference date of April 26, 2001. This declaration confirms applicants' invention of their claimed method steps prior to the date of the Shetty patent publication.

It is respectfully submitted that the application has now been brought into a condition where allowance of the entire case is proper. Reconsideration and issuance of a notice of allowance are respectfully solicited.

Respectfully submitted,



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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service on the date indicated below as first class mail in an envelope addressed to Mail Stop _____, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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